

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
AT MEMPHIS**

<b>OUTMEMPHIS; JANE DOE #1;</b>	)	
<b>JANE DOE #2; JANE DOE #3; and</b>	)	
<b>JANE DOE #4;</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:23-cv-02670</b>
	)	
<b>BILL LEE, in his official capacity as</b>	)	<b>Chief Judge Lipman</b>
<b>Governor of Tennessee; JONATHAN</b>	)	
<b>SKRMETTI, in his official capacity as</b>	)	<b>Magistrate Judge Claxton</b>
<b>Attorney General and Reporter of</b>	)	
<b>Tennessee; DAVID RAUSCH, in his</b>	)	
<b>official capacity as Director of the</b>	)	
<b>Tennessee Bureau of Investigation; and</b>	)	
<b>FRANK STRADA, in his official capacity</b>	)	
<b>as Commissioner of the Tennessee</b>	)	
<b>Department of Correction;</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

---

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

---

Defendants Governor of the State of Tennessee, Bill Lee, and Director of the Tennessee Bureau of Investigation, David B. Rausch, Tennessee Attorney General and Reporter, Jonathan Skrmetti, and Commissioner of the Tennessee Department of Correction, Frank Strada, hereby move under Fed. R. Civ. P. 6(b) for an extension of time in which to respond to the complaint, up to and including January 12, 2024.

Good cause exists for the requested extension. The parties have met and conferred multiple times to discuss a number of threshold matters in this case, including discovery planning and

ongoing good faith discussions regarding Defendants' need to know the identities of Plaintiffs Jane Does #1-4, without which Defendants cannot fully respond to the allegations in this case. The Parties are in the process of finalizing a temporary protective order for filing that will facilitate Defendants' ability to learn these identities, investigate the allegations, and respond to the complaint. To that end, counsel for Defendants have consulted with counsel for Plaintiffs regarding this issue, as well as the requested extension up to and including January 12, 2024. Counsel for Plaintiffs do not oppose this motion, and the parties agree that the extension is appropriate and in the best interests of the case.

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

/s/ John R. Glover  
CODY N. BRANDON (BPR# 037504)  
Managing Attorney  
Assistant Attorney General

JOHN R. GLOVER (BPR# 037772)  
Assistant Attorney General

DAVID RUDOLPH (BPR# 13402)  
Senior Assistant Attorney General

Law Enforcement &  
Special Prosecutions Division  
Office of the Tennessee  
Attorney General & Reporter  
PO Box 20207  
Nashville, TN 37202  
Off. (615) 532-2552  
Fax (615) 532-4892  
[Cody.Brandon@ag.tn.gov](mailto:Cody.Brandon@ag.tn.gov)  
[John.Glover@ag.tn.gov](mailto:John.Glover@ag.tn.gov)  
[David.Rudolph@ag.tn.gov](mailto:David.Rudolph@ag.tn.gov)

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 6th day of December 2023, upon:

Stella Yarbrough (BPR No. 033637)  
Jeff Preptit (BPR No. 038451)  
Lucas Cameron-Vaughn (BPR No. 036284)  
ACLU FOUNDATION OF TENNESSEE  
P.O. Box 120160  
Nashville, TN 37212  
Phone: (615) 320-7142  
[SYarbrough@aclu-tn.org](mailto:SYarbrough@aclu-tn.org)  
[JPreptit@aclu-tn.org](mailto:JPreptit@aclu-tn.org)  
[Lucas@aclu-tn.org](mailto:Lucas@aclu-tn.org)

Alexis Agathocleous (NY Bar 4227062)  
Alexis Alvarez (NY Bar 5854278)  
Jon W. Davidson (CA Bar 89301)  
Rachel Meeropol (NY Bar 4100954)  
AMERICAN CIVIL LIBERTIES UNION  
125 Broad St., New York, NY 10004  
Phone: (929) 585-0061  
[AAgathocleous@aclu.org](mailto:AAgathocleous@aclu.org)  
[AlexisA@aclu.org](mailto:AlexisA@aclu.org)  
[JonDavidson@aclu.org](mailto:JonDavidson@aclu.org)  
[RMeeropol@aclu.org](mailto:RMeeropol@aclu.org)

Lynly S. Egyes (NY Bar 4838025)  
Milo Inglehart (NY Bar 5817937)  
TRANSGENDER LAW CENTER  
594 Dean Street, Suite 11  
Brooklyn, NY 11238  
Phone: 510 587-9898 Ext. 353  
[Lynly@transgenderlawcenter.org](mailto:Lynly@transgenderlawcenter.org)  
[Milo@transgenderlawcenter.org](mailto:Milo@transgenderlawcenter.org)

Dale Melchert (NY Bar 5366554)  
TRANSGENDER LAW CENTER  
P.O. Box 70976  
Oakland, CA 94612  
Phone: (510) 587-9696 Ext. 354  
[Dale@transgenderlawcenter.org](mailto:Dale@transgenderlawcenter.org)

s/ John R. Glover  
JOHN R. GLOVER